LOCAL BANKRUPTCY FORM 5071-1 IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (HARRISBURG)

IN RE:

WILLIAM PATRICK MORRISON . BK. No. 1:14-bk-00621-RNO

Debtor

Chapter No. 13

WELLS FARGO BANK, N.A.

Movant . 11 U.S.C. §362

v.

WILLIAM PATRICK MORRISON

JUDITH MORRISON (NON-FILING CO
Name of Proceeding: MOTION FOR RELIEF FROM THE AUTOMATIC

DEBTOR) : STAY

Respondents : Document # 77

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance:

Parties are trying to resolve the matter and request to continue to July 12, 2017

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated:

June 6, 2017

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No. 89834 Phelan Hallinan Diamond & Jones, LLP

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CERTIFICATION OF SERVICE

TO THE BANKRUPTCY COURT CLERK:

Service upon the following persons was made by sending a true and correct copy of the Request to

Continue Hearing/Trial with Concurrence by first class mail or electronic means on the date listed below.

CHARLES J. DEHART, III, ESQUIRE

(TRUSTEE)

8125 ADAMS DRIVE, SUITE A

HUMMELSTOWN, PA 17036

GARY J IMBLUM, ESQUIRE

IMBLUM LAW OFFICES 4615 DERRY STREET

HARRISBURG, PA 17111

UNITED STATES TRUSTEE 228 WALNUT STREET, SUITE 1190

HARRISBURG, PA 17101

DATE: June 6, 2017

WILLIAM PATRICK MORRISON 1309 PINCH VALLEY ROAD WESTMINSTER, MD 21158

JUDITH MORRISON

1309 PINCH VALLEY ROAD WESTMINSTER, MD 21158

WILLIAM PATRICK MORRISON

 $830S 14^{TH} AVENUE$

LEBANON, PA 17042

/s/ Thomas Song, Esquire

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